

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOSHUA BROUGHTON, a/k/a “Twiggz” and
“Hot Boy,”
CHRISTOPHER SINGLETON, a/k/a “Shoota,”
JARON DAVIS, a/k/a “JRacks,” and
GRIEG MACON, a/k/a “Sixty”

UNDER SEAL

Case No. 23 CR 384

Violation: Title 18, United
States Code, Sections 875(c),
1959(a)(1), 924(j)(1)

**SUPERSEDING
INDICTMENT**

COUNT ONE

The SPECIAL OCTOBER 2022 GRAND JURY charges:

At times material to this Indictment:

1. The defendants, and others known and unknown to the grand jury, were members and associates of the Rack City street gang, a criminal organization whose members and associates engaged in acts of violence and trafficking in controlled substances, and which operated on the South Side of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The Rack City street gang, including its leadership, membership, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce.

3. The Rack City enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

4. The purposes of the enterprise included, but were not limited to, the following:

- a. Acquiring, preserving, and protecting power, territory, operations, and proceeds for the enterprise through the use of threats, intimidation, and violence;
- b. The illegal trafficking in controlled substances on behalf of the gang;
- c. Promoting and enhancing the enterprise, and its members' and associates' activities, including by publicly claiming responsibility for acts of violence committed by the enterprise and taunting rival gang members;
- d. Increasing the status of the enterprise through the use of social media platforms and music; and
- e. Taking steps designed to prevent law enforcement's detection of the enterprise's criminal activities.

Means and Methods of the Enterprise

5. The means and methods by which members and associates of the enterprise conducted and participated in the conduct and the affairs of the enterprise included, but were not limited to, the following:

- a. Using intimidation, threats of violence, and violence to preserve, expand, and protect the gang's territory and activities, such as the illegal trafficking of controlled substances;
- b. Acquiring and possessing firearms to protect the gang's leaders, members, and associates, and to attack or retaliate against victims, rival gang members, and witnesses;
- c. Using social media to communicate with other gang members and to promote the gang and its activities, such as the illegal trafficking of controlled substances;
- d. Distributing and agreeing to distribute controlled substances on behalf of the gang; and
- e. Hindering and obstructing law enforcement from identifying, apprehending, and successfully prosecuting fellow gang members.

6. At times relevant to this Indictment, the Rack City enterprise, including its leadership, membership, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

7. On or about June 1, 2021, at Chicago, in the Northern District of Illinois, Eastern Division,

JOSHUA BROUGHTON, a/k/a "Twiggz" and "Hot Boy,"
CHRISTOPHER SINGLETON, a/k/a "Shoota,"
JARON DAVIS, a/k/a "JRacks," and
GRIEG MACON, a/k/a "Sixty,"

defendants herein, for the purpose of maintaining and increasing position in Rack City, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Ogonnia Okeke, in violation of the laws of the State of Illinois (Chapter 720, Illinois Compiled Statutes, Sections 5/9-1(a)(1), 5/5-1, and 5/5-2);

In violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT TWO

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about June 1, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

JOSHUA BROUGHTON, a/k/a “Twiggz” and “Hot Boy,”
CHRISTOPHER SINGLETON, a/k/a “Shoota,”
JARON DAVIS, a/k/a “JRacks,” and
GRIEG MACON, a/k/a “Sixty,”

defendants herein, and others known and unknown to the Grand Jury, knowingly used and carried a firearm during and in relation to a crime of violence for which each defendant may be prosecuted in a court of the United States, namely, the murder of Ogonnia Okeke in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(1), as set forth in Count One of this Indictment, and in the course of committing such offense, in violation of Title 18, United States Code, Section 924(c), caused the death of Ogonnia Okeke through the use of a firearm, which killing was murder as defined in Title 18, United States Code, Section 1111(a);

In violation of Title 18, United States Code, Sections 924(j)(1) and 2.

COUNT THREE

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

On or about May 29, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

CHRISTOPHER SINGLETON, also known as “Shoota,”
defendant herein, knowingly transmitted in interstate commerce a communication
containing a threat to injure the person of another, namely an Instagram message
stating, “Bro imma kill you with this switch g y’all now out,” and transmitted the
communication for the purpose of making a threat, or knowing that the
communication would be viewed as a threat, or recklessly disregarding a substantial
risk that others would regard this communication as a threat;

In violation of Title 18, United States Code, Section 875(c).

NOTICE OF SPECIAL FINDINGS

1. The allegations set forth in Count One are incorporated here.
2. The defendants JOSHUA BROUGHTON, CHRISTOPHER SINGLETON, JARON DAVIS, and GRIEG MACON:
 - a. Were eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
 - b. Intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));
 - c. Intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)); and
 - d. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY